

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Suits Naming the Tennessee Clinic)
Defendants)

**TENNESSEE CLINIC DEFENDANTS'
NOTICE OF WITHDRAWAL OF
OMNIBUS RESPONSE TO
MOTIONS TO WITHDRAW FILED BY COUNSEL
FOR NECC INSIDERS AND AFFILIATES
*ONLY AS TO GDC***

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively "Tennessee Clinic Defendants") hereby give notice that:

1. At Dkt. 2001, the Tennessee Clinic Defendants filed a response to the pending motions to withdraw by counsel for Ameridose (1936, 1979), GDC (1947), and Barry Cadden, Lisa Cadden, Glenn Chin, Carla Conigliaro, Douglas Conigliaro, and Greg Conigliaro (1941). The Tennessee Clinic Defendants did not oppose the withdrawal but asked that successor counsel or the agent for service of process be identified for these parties.

2. Since that time, present counsel for GDC notified the Tennessee Clinic Defendants that successor counsel has not been identified and that Gregory Conigliaro, 701 Waverly Street, Framingham, MA 01701, remains the proper agent for service of process.¹

3. Thus, the Tennessee Clinic Defendants withdraw their response as to Dkt. 1947. The Tennessee Clinic Defendants still request the same information for Barry Cadden, Lisa Cadden, Glenn Chin, Carla Conigliaro, Douglas Conigliaro, and Greg Conigliaro.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

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Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

¹ Ameridose has also provided the requested information [Dkt. 2013].

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 2nd day of July, 2015.

/s/ Chris J. Tardio

Chris J. Tardio